IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

IN RE: VALSARTAN PRODUCTS LIABILITY LITIGATION MDL No.2875

THIS DOCUMENT RELATES TO ALL

CASES, INCLUDING CIVIL ACTION

NO.: 120-cv-07285-RBK-JS

Civil No. 19-2875 (RBK/JS)

NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE AS TO DEFENDANT PRAXIS SPECIALTY PHARMACY, LLC

WHEREAS the Court entered Case Management Order No. 15, which provides a mechanism for certain defendants to obtain a without prejudice dismissal from all cases pending in this MDL alleging claims in connection with allegedly contaminated valsartan-containing drugs ("VCDs");

WHEREAS Defendant Praxis Specialty Pharmacy, LLC having provided the information and documents required by Case Management Order No. 15, and having agreed to the tolling provisions therein:

IT IS HEREBY STIPULATED AND AGREED between Plaintiffs Executive Committee and Defendant Praxis Specialty Pharmacy, LLC that all current cases pending and all future cases to be filed in this MDL alleging claims against Defendant Praxis Specialty Pharmacy, LLC in connection with allegedly contaminated VCDs be and hereby are dismissed without prejudice.

On behalf of Plaintiffs' Executive Committee

On behalf of Peripheral Defendant

Jennifer A. Mauri, Esq.

Dated: 03/15/2021 Dated: 03/10/2021

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

IN RE: VALSARTAN LOSARTAN AND IRBESARTAN PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO ALL CASES, INCLUDING CIVIL ACTION NO.: 1:20-cv-07285-RBK-JS

EMPLOYERS AND LABORERS LOCALS 100 AND 397 HEALTH AND WELFARE FUND and STEAMFITTERS LOCAL 439, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

ZHEJIANG HUAHAI PHARMACEUTICAL CO., LTD.; HUAHAI US INC.; PRINSTON PHARMACEUTICAL INC. d/b/a SOLCO HEALTHCARE LLC; SOLCO HEALTHCARE US, LLC; HETERO LABS, LTD.; HETERO DRUGS, LIMITED; HETERO USA INC.; CAMBER PHARMACEUTICALS, INC.; MYLAN LABORATORIES, LTD.; MYLAN N.V.; MYLAN PHARMACEUTICALS, INC.; AUROBINDO PHARMA, LTD.; AUROBINDO PHARMA USA, INC.; AUROLIFE PHARMA, LLC; TEVA PHARMACEUTICALS LTD.; TEVA PHARMACEUTICALS USA, INC.; ARROW PHARM MALTA LTD.; ACTAVIS PHARMA, INC.; ACTAVIS, LLC; TORRENT PRIVATE LIMITED; TORRENT PHARMACEUTICALS, LTD.; TORRENT PHARMA, INC.; "JOHN DOE" WHOLESALERS; A-S MEDICATION SOLUTIONS, LLC; BRYANT RANCH PREPACK, INC.; H J HARKINS CO., INC. d/b/a PHARMA PAC; MAJOR PHARMACEUTICALS, INC.;

LEAD CASE: 1:19-md-02875-RBK-JS

Honorable Robert B. Kugler

CIVIL ACTION NO.: 1:20-cv-07285-RBK-JS

CERTIFICATE OF SERVICE

REMEDYREPACK, INC.; NORTHWIND PHARMACEUTICALS; NUCARE PHARMACEUTICALS, INC.; PREFERRED PHARMACEUTICALS, INC.; AVKARE, INC.; WALGREENS BOOTS ALLIANCE, INC.; CVS HEALTH CORPORATION; WALMART INC.; RITE AID CORPORATION; THE KROGER, CO.; MEDICINE SHOPPE INTERNATIONAL, INC.; EXPRESS SCRIPTS, INC.; EXPRESS SCRIPTS HOLDING COMPANY; PRAXIS SPECIALTY PHARMACY, LLC; and "JOHN DOE" PHARMACIES, Defendants.

CERTIFICATE OF SERVICE

I hereby certify that on March 15, 2021, I electronically filed the foregoing Notice of Voluntary Dismissal Without Prejudice As To Defendant Praxis Specialty Pharmacy, LLC with the Clerk of Court using the CM/E CF system which will send notification of such filing to all parties that are CM/E CF participants in this action.

Date: March 15, 2021

Respectfully submitted,

MICHELMAN & ROBINSON, LLP

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